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*Attorney for Defendant LG Electronics  
U.S.A., Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANDREW JAMES MCGONIGLE,  
*on behalf of himself and others  
similarly situated,*

*Plaintiff,*

Civil Case No. 2:25-cv-02700  
Hon. Susan D. Wigenton U.S.D.J.  
Hon. Jessica S. Allen U.S.M.J.

v.

LG ELECTRONICS U.S.A., INC.,

*Defendant.*

**NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

PLEASE TAKE NOTICE that, at the Court's earliest convenience, Defendant LG Electronics U.S.A., Inc. ("LG Electronics") will move this Court for entry of an order pursuant to Local Civil Rule 101.1(c) admitting as counsel *pro hac vice* in this matter Daniel S. Blynn and Cannon M. Jurrens of the law firm of Steptoe LLP.

PLEASE TAKE FURTHER NOTICE that Defendant LG Electronics will rely on the Certification of Justin Ben-Asher and the Certifications of Daniel S. Blynn and Cannon M. Jurrens in support of the admission. A Proposed Order granting *pro hac vice* admission to Daniel S. Blynn and Cannon M. Jurrens is filed herewith.

PLEASE TAKE FURTHER NOTICE that counsel for Plaintiff Andrew McGonigle has consented to the *pro hac vice* admission of Daniel S. Blynn and Cannon M. Jurrens.

Dated: April 16, 2025

Respectfully submitted,

/s/ Justin Ben-Asher

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(*pro hac vice* application forthcoming)  
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